

ORIGINAL

Approved: Mitzi S. Steiner

MITZI S. STEINER

Assistant United States Attorney

Before: THE HONORABLE SARAH NETBURN  
United States Magistrate Judge  
Southern District of New York

19 MAG 10824

UNITED STATES OF AMERICA

- v. -

XINGHUI LIN,

Defendant.

16 Mag.

RULE

5(c)(3)

AFFIDAVIT

SOUTHERN DISTRICT OF NEW YORK, ss:

QIJI WANG, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration ("DEA"), and charges as follows:

On or about November 6, 2019, the United States District Court for the Southern District of Ohio issued a warrant for the arrest of "Xinghui Lin" based on an indictment charging him with money laundering conspiracy, in violation of Title 18, United States Code, Section 1956(h), and money laundering, in violation of Title 18 United States Code, Section 1956(a)(1)(A)(i). A copy of the arrest warrant and the indictment are attached hereto as Exhibits A and B, respectively, and incorporated by reference herein.

I believe that XINGHUI LIN, the defendant, who was taken into DEA custody on November 18, 2019, in the Southern District of New York, is the same individual as "Xinghui Lin" who is wanted by the United States District Court for Southern District of Ohio.

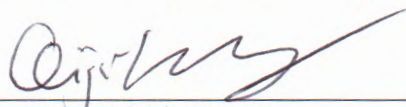
The bases for my knowledge and for the foregoing charge are, in part, as follows:

1. I am a DEA agent. I have been personally involved in determining whether XINGHUI LIN, the defendant, is the same individual as the "Xinghui Lin" named in the November 6, 2019 arrest warrant from the United States District Court for the Southern District of Ohio. Because this Affidavit is being submitted for the limited purpose of establishing the identity of the defendant, I have not included in this Affidavit each and every fact that I have learned. Where I report statements made by others, those statements are described in substance and in part, unless otherwise noted.

2. Based on my review of documents from proceedings in the United States District Court for the Southern District of Ohio, I know that, on or about November 6, 2019, the United States District Court for the District of Ohio issued a warrant for the arrest of "Xinghui Lin" (the "Arrest Warrant"). The Arrest Warrant was issued based on an Indictment (the "indictment") charging "Xinghui Lin" with conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h), and money laundering, in violation of Title 18 United States Code 1956(a)(1)(A)(i). The Indictment was filed in connection with criminal case number 1:19-cr-130(17) in the Southern District of Ohio.

3. On November 18, 2019, at approximately 12:30 p.m., I arrested XINGHUI LIN, the defendant. Following his arrest, LIN responded to the name "LIN" and confirmed that his date of birth is June 23, 1980, which is the same date of birth on record for the "Xinghui Lin" named in the arrest warrant. A DEA agent in the Southern District of Ohio sent me a copy of the driver's license of "Xinghui Lin" and, based on my observations in connection with the arrest, the individual pictured appears to be LIN.

WHEREFORE, I respectfully request that XINGHUI LIN,  
the defendant, be imprisoned or bailed as the case may be.



Special Agent Qiji Wang  
Drug Enforcement Administration

Sworn to before me this  
18th day of November, 2019.



THE HONORABLE SARAH NETBURN  
United States Magistrate Judge  
Southern District of New York

EXHIBIT A

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

## UNITED STATES DISTRICT COURT

2019 NOV -6 PM 3:34

for the

Southern District of Ohio

U.S. DISTRICT COURT  
SOUTHERN DIST OHIO  
WEST DIV CINCINNATI

United States of America

v.

Case No.

1:19CR 130(17)

XINGHUI LIN

Defendant

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) XINGHUI LIN

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment   
 ☐ Superseding Indictment   
 ☐ Information   
 ☐ Superseding Information   
 ☐ Complaint  
☐ Probation Violation Petition   
 ☐ Supervised Release Violation Petition   
 ☐ Violation Notice   
 ☐ Order of the Court

This offense is briefly described as follows:

18 USC 1956(h) - Money Laundering Conspiracy  
 18 USC 1956(a)(1)(A)(i) - Money Laundering

Date: 11/6/19

Issuing officer's signature

City and state: CINCINNATI, OHIO

Richard W. Nagel, Clerk of Court

Printed name and title

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
 at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title



**This second page contains personal identifiers provided for law-enforcement use only  
and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: \_\_\_\_\_

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates *(name, relation, address, phone number)*: \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: \_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer *(if applicable)*: \_\_\_\_\_

Date of last contact with pretrial services or probation officer *(if applicable)*: \_\_\_\_\_

EXHIBIT B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

2019 NOV -6 PM 3:33

UNITED STATES OF AMERICA,

CASE NO.

1:19-cr-00180

Plaintiff,

JUDGE BLACK

v.

INDICTMENT

JOSE DANIEL ZAZUETA-  
HERNANDEZ, A.K.A. JESUS  
BOJORQUEZ, A.K.A. "DANY" (1)

18 U.S.C. § 2  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(a)(2)  
18 U.S.C. § 1956(a)(1)(A)(i)

DERRICK BRYANT (2)

18 U.S.C. § 1956(h)  
21 U.S.C. § 841(a)(1)

DANIEL SIMMONS (3)

21 U.S.C. § 841(b)(1)(A)(ii)  
21 U.S.C. § 841(b)(1)(A)(vi)  
21 U.S.C. § 841(b)(1)(B)(viii)

WILLIAM F. GRAHAM, III (4)

21 U.S.C. § 841(C)

CARLOS FLORES-INZUNZA (5)

21 U.S.C. § 846

21 U.S.C. § 856(a)(1)

31 U.S.C. § 5324(b)

31 U.S.C. § 5331

JOSE TOQUILLAS-FELIX (6)

LASHONE ISOM (7)

NOTICE OF FORFEITURE

MAURICE JACKSON (8)

DANIEL MONTEZ BLAINE (9)

FRANCISCO CASIQUE (10)

RAYMOND JAMES EDWARDS, JR. (11)

CHRISTOPHER ENGLE (12)

RADEE GARRETT (13)

CARL RENA GILBERT (14)

CARDALE A. GOENS (15)

AYMAN ANIS AL HAJJEH (16)



**XINGHUI LIN (17)**  
**FRANCES ALEXIA MERCADO (18)**  
**KYMYATTA OATIS (19)**  
**ERNESTO RINCON (20)**  
**ANDRE ROBINSON (21)**  
**JOEL SALCEDO (22)**  
**ROBERT SMITH (23)**  
**CHRISTOPHER WILLIAM TALLEY  
(24)**  
**DONALD THOMPSON (25)**  
**VILMA VIDAL-FLORES (26)**  
**HAROLD LAMAR WALKER (27)**  
**STEFAN WALKER (28)**  
**MIN WANG (29)**  
**NICHOLAS WHITE (30)**  
**BRANDON TERRELL WILLIS (31)**  
**MAURICE RINGWOOD (32)**  
**IVAN COURTNEY JOHNSON (33)**  
**VYACHESLAV MINYALO A.K.A.  
"SLAVIK" (34)**  
**DEWAYNE LAMONT WALKER (35)**  
**YOSI ILOUZ (36)**

**BRADY CUNNINGHAM**

**Defendants.**

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**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**  
**(Narcotics Conspiracy)**

Beginning on or about or about March 1, 2016, the exact date being unknown and continuing up to and including October 29, 2019, the exact date being unknown, within the Southern District of Ohio, and elsewhere, the defendants, **JOSE DANIEL ZAZUETA-HERNANDEZ, A.K.A. JESUS BOJORQUEZ, A.K.A. "DANY"; DERRICK BRYANT; DANIEL SIMMONS; WILLIAM F. GRAHAM, III; CARLOS FLORES-INZUNZA; JOSE TOQUILLAS-FELIX; LASHONE ISOM; MAURICE JACKSON; DANIEL MONTEZ BLAINE; FRANCISCO CASIQUE; RAYMOND JAMES EDWARDS, JR.; CHRISTOPHER ENGLE; RADEE GARRETT; CARL RENA GILBERT; CARDALE A. GOENS; FRANCES ALEXIA MERCADO; KYMYATTA OATIS; ERNESTO RINCON; ANDRE ROBINSON; JOEL SALCEDO; ROBERT SMITH; CHRISOPHTER WILLIAM TALLEY; DONALD THOMPSON; VILMA VIDAL-FLORES; HAROLD LAMAR WALKER; STEFAN WALKER; NICHOLAS WHITE; BRANDON TERRELL WILLIS; MAURICE RINGWOOD; IVAN COURTNEY JOHNSON; BRADY CUNNINGHAM;** and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree with each other and with others known and unknown to the Grand Jury, to possess with intent to distribute and to distribute mixtures and substances containing a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, the amount of said mixture and substance was 5 kilograms or more, and

substances containing fentanyl, a Schedule II controlled substance, the amount of said mixture and substance was 400 grams or more, and substances containing methamphetamine, a Schedule II controlled substance, the amount of said mixture and substance was 500 grams or more, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii)(vi)(viii) and 841(b)(1)(C).

**All in violation of 21 U.S.C. § 846.**

**COUNT TWO**

**(Distribution and Possession with Intent to Distribute a Controlled Substance)**

On or about October 24, 2019, within the Southern District of Ohio, and elsewhere, the defendant, **LASHONE ISOM**, did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

**In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2.**

**COUNT THREE**

**(Distribution and Possession with Intent to Distribute a Controlled Substance)**

On or about October 24, 2019, within the Southern District of Ohio, and elsewhere, the defendant, **MAURICE JACKSON**, did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, the amount of said mixture and substance was 500 grams or more.

**In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(ii) and 18 U.S.C. § 2.**

**COUNT FOUR**

**(Distribution and Possession with Intent to Distribute a Controlled Substance)**

On or about October 24, 2019, within the Southern District of Ohio, and elsewhere, the defendant, **WILLIAM F. GRAHAM, III**, did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, the amount of said mixture and substance was 5 kilograms or more.

**In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(ii) and 18 U.S.C. § 2.**



**COUNT FIVE**

**(Distribution and Possession with Intent to Distribute a Controlled Substance)**

On or about October 24, 2019, within the Southern District of Ohio, and elsewhere, the defendant, **WILLIAM F. GRAHAM, III**, did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, the amount of said mixture and substance was 400 grams or more.

**In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(vi) and 18 U.S.C. § 2.**

**COUNT SIX**

**(Distribution and Possession with Intent to Distribute a Controlled Substance)**

On or about October 24, 2019, within the Southern District of Ohio, and elsewhere, the defendant, **DANIEL SIMMONS**, did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

**In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2.**

**COUNT SEVEN**

**(Possession by a Prohibited Person)**

On or about October 24, 2019, in the Southern District of Ohio, the defendant, **LASHONE ISOM**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, that is, a Glock 22, 40 caliber handgun bearing serial number BTX116 and ammunition, and the firearm and ammunition were in and affecting interstate and foreign commerce.

**In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).**

**COUNT EIGHT**

**(Possession by a Prohibited Person)**

On or about October 24, 2019, in the Southern District of Ohio, the defendant, **DANIEL SIMMONS**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, that is, a SCCY,

CPX-1, 9mm semi-automatic handgun bearing Serial Number 655747 and ammunition, and the firearm and ammunition were in and affecting interstate and foreign commerce.

**In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).**

**COUNT NINE**  
**(Operating a drug involved premises)**

Beginning on or about or about April 1, 2019, the exact date being unknown and continuing up to and including October 24, 2019, within the Southern District of Ohio, and elsewhere, the defendants, **CARLOS FLORES-INZUNZA** and **JOSE TOQUILLAS-FELIX**, with others known and unknown to the grand jury, did knowingly and willfully open, lease, rent, use or maintain any place; to wit: 5617 Prosser Avenue, Cincinnati, Ohio, 45216 whether permanently or temporarily for the purpose of distributing a controlled substance.

**In violation of 21 U.S.C. § 856(a)(1) and 18 U.S.C. § 2.**

**COUNT TEN**  
**(Operating a drug involved premises)**

Beginning on or about or about April 1, 2019, the exact date being unknown and continuing up to and including October 24, 2019, within the Southern District of Ohio, and elsewhere, the defendant, **WILLIAM F. GRAHAM, III**, with others known and unknown to the grand jury, did knowingly and willfully open, lease, rent, use or maintain any place; to wit: 3059 Glenmore Ave # 3, Cincinnati, Ohio, 45238 whether permanently or temporarily for the purpose of distributing a controlled substance.

**In violation of 21 U.S.C. § 856(a)(1) and 18 U.S.C. § 2.**

**COUNT ELEVEN**  
**(Money Laundering Conspiracy)**

**Introduction – the businesses**

Tri-State Jewelers, Inc. a.k.a. TSJ Jewelers, Inc. (hereafter Tri-State Jewelers) was incorporated on or about August 2, 2015 in the State of Ohio. The contact person, authorized



representative and register agent is listed as **VYACHESLAV MINYAYLO a.k.a. "SLAVIK,"** with an address of 630 Race Street, Cincinnati, OH 45202. **YOSSI "JOE" ILOUZ** is a United States citizen who has been running and managing Tri-State Jeweler since at least 2014. Tri-State Jeweler has a business account with PNC Bank, account ending in 5259, which lists 630 Race Street, Cincinnati, OH as the place of business with **VYACHESLAV MINYAYLO a.k.a. "SLAVIK"** as the signor of the account, which was opened on or about July 24, 2015.

Nationwide Automotive Group, Inc. (hereafter Nationwide Automotive) was incorporated on or about May 14, 2012 in the State of Ohio. **VYACHESLAV MINYAYLO a.k.a. "SLAVIK"** was listed as the incorporator with an address of 5200 Dixie Hwy., Fairfield, OH 45214. On or about February 5, 2018, Amendments to Articles of Incorporation were filed with the Ohio Secretary of State listing **MINYAYLO** as the Vice President of Nationwide Automotive and informing the State of Ohio that Nationwide Automotive had relocated to 7725 Vine Street, Cincinnati Ohio. **DEWAYNE WALKER** is a United States citizen who manages Nationwide Automotive. Nationwide Automotive has a business account with PNC Bank, account ending in 0821, which lists 7725 Vine Street, Cincinnati OH as the place of business with **MINYAYLO** as one of the signors, and which was opened on or about May 11, 2012.

#### **The Conspiracy**

Beginning in or about September 2018, and continuing up to September 20, 2019, in the Southern District of Ohio, defendants **VYACHESLAV MINYAYLO a.k.a. "SLAVIK," DEWAYNE WALKER, YOSI ILOUZ, JOSE DANIEL ZAZUETA-HERNANDEZ, A.K.A. JESUS BOJORQUEZ, A.K.A. "DANY", XINGHUI LIN, AYMAN HAJJEH, CARLOS FLORES-INZUNZA and MIN WANG,** did knowingly, intentionally, and unlawfully conspire to conduct financial transactions affecting interstate commerce, which involved the proceeds of specified unlawful activity, that is narcotics trafficking, with the intent to promote the carrying on of specified unlawful activity, to wit: the sale or distribution of controlled substances as defined in

the Controlled Substances Act and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i).

#### **The Goal of the Conspiracy**

It was a goal of the conspiracy that **VYACHESLAV MINYAYLO a.k.a. "SLAVIK", DEWAYNE WALKER, YOSI ILOUZ, JOSE DANIEL ZAZUETA-HERNANDEZ, A.K.A. JESUS BOJORQUEZ, A.K.A. "DANY", XINGHUI LIN, AYMAN HAJJEH, CARLOS FLORES-INZUNZA, MIN WANG,** and others, would launder illegal proceeds/profits from illegal narcotics trafficking, by knowingly conducting and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, narcotics trafficking, with the intent to promote the carrying on of specified unlawful activity, to wit: the sale or distribution of controlled substances as defined in the Controlled Substances Act and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

#### **Manner and Means to Accomplish the Conspiracy**

It was a part of the conspiracy that **VYACHESLAV MINYAYLO a.k.a. "SLAVIK", DEWAYNE WALKER and YOSI ILOUZ** would make and/or accept cash payments for goods which was used for their personal use, and for the use and benefit of members of illegal narcotics organizations, including, but not limited to the BRYANT DTO, and which furthered the illegal narcotics distribution activities.

It was further part of the conspiracy that members of the conspiracy would take and keep stored at Tri-State Jeweler and Nationwide Automotive amounts of United States currency known to be derived from the sale of narcotics.

It was further part of the conspiracy that **JOSE DANIEL ZAZUETA-HERNANDEZ,**



**A.K.A. JESUS BOJORQUEZ, A.K.A. "DANY", XINGHUI LIN, AYMAN HAJJEH, CARLOS FLORES-INZUNZA and MIN WANG**, and others working on behalf of them and others, would conceal the monies earned from the sale of controlled substances (hereafter referred to as drug proceeds) in the greater Cincinnati, Ohio area in various bags and/or packages to transport the illegal proceeds via interstate commerce to and from the Cincinnati, Ohio area, among other places.

It was further part of the conspiracy that **JOSE DANIEL ZAZUETA-HERNANDEZ, A.K.A. JESUS BOJORQUEZ, A.K.A. "DANY", VYACHESLAV MINYAYLO a.k.a. "SLAVIK", DEWAYNE WALKER, YOSI ILOUZ, XINGHUI LIN, AYMAN ANIS AL HAJJEH, CARLOS FLORES-INZUNZA, and MIN WANG** committed the following acts:

1. On or about May 2, 2019, **ILOUZ**, while acting in his management capacity with Tri-State Jeweler, accepted \$1,400 in United States currency for the purchase of a diamond pendant necklace.
2. On or about June 12, 2019, **MINYAYLO a.k.a. "SLAVIK"**, while acting in his capacity as owner of Tri-State Jeweler, accepted \$15,000 in United States currency for the purchase of a diamond ring.
3. On or about July 1, 2019, **MINYAYLO a.k.a. "SLAVIK"**, while acting in his capacity as owner of Tri-State Jeweler, accepted \$4,000 in United States currency for the purchase of a diamond ring.
4. On or about July 30 2019, **WALKER**, while acting in his capacity as manager of Nationwide Automotive, accepted \$38,800 in United States currency for the purchase of an automobile.
5. Between approximately December 2018 up through and including April, 2019, and beyond, **MINYAYLO a.k.a. "SLAVIK" and ILOUZ** took and agreed to store, at

least temporarily, at Tri-State Jeweler United States currency in the amount of approximately \$2,500,000.00

6. Between approximately November 2018 up through and including April, 2019, and beyond, **MINYAYLO a.k.a. "SLAVIK" and WALKER** took and agreed to store, at least temporarily, at Nationwide Automotive United States currency in the amount of \$800,000.00.
7. On or about August 7, 2019, **ZAZEUTA-HERNANDEZ** provided \$59,960 in United States currency to **LIN** who then provided the currency to **AL HAJJEH** for the purpose of transferring the currency to another location.
8. On or about September 20, 2019, **ZAZEUTA-HERNANDEZ** provided \$79,980 in United States currency to **FLORES-INZUNZA** who then provided the currency to **WANG** for the purpose of transferring the money to another location

**All in violation of 18 U.S.C. § 1956(h).**

**COUNT TWELVE**  
**(Money Laundering)**

On or about the dates set forth below, in the Southern District of Ohio, defendants **JOSE DANIEL ZAZUETA-HERNANDEZ, A.K.A. JESUS BOJORQUEZ, A.K.A. "DANY", XINGHUI LIN, and AYMAN ANIS AL HAJJEH** did knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce as described below, which involved the proceeds of a specified unlawful activity, that is, narcotics trafficking, with the intent to promote the carrying on of specified unlawful activity, to wit: the sale or distribution of controlled substances as defined in the Controlled Substances Act and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity:



COUNT	DATE	MONETARY TRANSACTION
12	08/07/2019	<b>ZAZUETA-HERNANDEZ</b> provided \$59,960 in United States currency to <b>LIN</b> who then provided the currency to <b>AL HAJJEH</b> for the purpose of transferring the money to another location.

All in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i) and 2.

**COUNTS THIRTEEN**  
(Money Laundering)

On or about the dates set forth below, in the Southern District of Ohio, defendant(s) **JOSE DANIEL ZAZUETA-HERNANDEZ, A.K.A. JESUS BOJORQUEZ, A.K.A. "DANY", CARLOS FLORES-INZUNZA and MIN WANG**, did knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce as described below, which involved the proceeds of a specified unlawful activity, that is, narcotics trafficking, with the intent to promote the carrying on of specified unlawful activity, to wit: the sale or distribution of controlled substances as defined in the Controlled Substances Act and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity:

COUNT	DATE	FINANCIAL TRANSACTION
13	09/20/2019	<b>ZAZUETA-HERNANDEZ</b> provided \$79,980 in United States currency to <b>FLORES-INZUNZA</b> who then provided the currency to <b>WANG</b> for the purpose of transferring the money to another location.

All in violation of 18 U.S.C. § § 1956(a)(1)(A)(i) and 2.

**COUNT FOURTEEN**  
(Failure to File Reports Related to Currency)

**Introduction**

At all times relevant to this Count:

Tri-State Jewelers, Inc. a.k.a. TSJ Jewelers, Inc. was a nonfinancial trade or business within



the meaning of Title 31, United States Code, Sections 5331 and 5324(b), and the regulations issued thereunder.

Title 31, United States Code, Section 5331, and the regulations issued thereunder, required that each nonfinancial trade or business that, in the course of such trade or business, received more than \$10,000 in coins or currency in one transaction or two or more related transactions, file a report with the Financial Crimes Enforcement Network.

Defendant **VYACHESLAV MINYAYLO a.k.a. "SLAVIK"**, was the authorized representative and statutory agent of Tri-State Jewelers, Inc., a.k.a. TSJ Jewelers, Inc. and was duly authorized to act on the company's behalf in matters of sales and receipt of proceeds from sales of jewelry.

#### **The Offense Conduct**

In or around June 2019, in the Southern District of Ohio and elsewhere, defendant **VYACHESLAV MINYAYLO a.k.a. "SLAVIK"**, did knowingly and willfully and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5331, and the regulations issued thereunder, cause a nonfinancial trade or business, namely Tri-State Jewelers, Inc., a.k.a. TSJ Jewelers, Inc., to fail to file a report required under Title 31, United States Code, Section 5331, in connection with the receipt by Tri-State Jewelers, Inc., a.k.a. TSJ Jewelers, Inc. of United States currency in amounts over \$10,000.

**All in violation of 31 U.S.C. § 5324(b) and 5331 and 18 U.S.C. § 2.**

#### **COUNT FIFTEEN** **(Failure to File Reports Related to Currency)**

##### **Introduction**

At all times relevant to this Count:

Nationwide Automotive Group, Inc. was a nonfinancial trade or business within the meaning of Title 31, United States Code, Sections 5331 and 5324(b), and the regulations issued

thereunder.

Title 31, United States Code, Section 5331, and the regulations issued thereunder, required that each nonfinancial trade or business that, in the course of such trade or business, received more than \$10,000 in coins or currency in one transaction or two or more related transactions, file a report with the Financial Crimes Enforcement Network.

Defendant **DEWAYNE WALKER**, was the manager and employee of Nationwide Automotive Group, Inc. and was duly authorized to act on the company's behalf in matters of sales and receipt of proceeds from sales of automobiles.

#### **The Offense Conduct**

In or around July 2019, in the Southern District of Ohio and elsewhere, defendant, **DEWAYNE WALKER**, did knowingly and willfully and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5331, and the regulations issued thereunder, cause a nonfinancial trade or business, namely Nationwide Automotive Group, Inc., to fail to file a report required under Title 31, United States Code, Section 5331, in connection with the receipt by Nationwide Automotive Group, Inc. of United States currency in amounts over \$10,000.

**All in violation of 31 U.S.C. § § 5324(b) and 5331 and 18 U.S.C. § 2.**

#### **FORFEITURE ALLEGATION ONE**

Upon conviction of one or more of the offenses set forth in Counts 1 through 6, 9, and/or 10 of this Indictment, the defendants, **JOSE DANIEL ZAZUETA-HERNANDEZ, A.K.A. JESUS BOJORQUEZ, A.K.A. "DANY"; DERRICK BRYANT; DANIEL SIMMONS; WILLIAM F. GRAHAM, III; CARLOS FLORES-INZUNZA; JOSE TOQUILLAS-FELIX; LASHONE ISOM; MAURICE JACKSON; DANIEL MONTEZ BLAINE; FRANCISCO CASIQUE; RAYMOND JAMES EDWARDS, JR.; CHRISTOPHER ENGLE; RADEE GARRETT; CARL RENA GILBERT; CARDALE A. GOENS; FRANCES ALEXIA MERCADO; KYMYATTA OATIS; ERNESTO RINCON; ANDRE ROBINSON; JOEL**



**SALCEDO; ROBERT SMITH; CHRISTOPHER WILLIAM TALLEY; DONALD THOMPSON; VILMA VIDAL-FLORES; HAROLD LAMAR WALKER; STEFAN WALKER; NICHOLAS WHITE; BRANDON TERRELL WILLIS; MAURICE RINGWOOD; IVAN COURTNEY JOHNSON; and BRADY CUNNINGHAM,** shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation(s), and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation(s), including but not limited to:

- a) A sum of money equal to the amount of proceeds the defendants obtained as a result of the offense(s);
- b) Real Property known and numbered as 9812 Beech Drive, Cincinnati, Hamilton County, Ohio 45231, with all appurtenances, attachments and improvements attached thereto, legally described as:

Situated in Section 16, Town 3, Entire Range 1, Springfield Township, Hamilton County, Ohio and being all of Lot No. 166 of The Meadows of Wright Farm, Phase III, recorded in Registered Land Plat Book 83, pages 33 through 35 of the Records of the Hamilton County, Ohio Recorder's Office.

The foregoing general warranty covenants are subject to the Declaration of Covenants, Easements, Conditions and Restrictions for Wright Farm Estates as recorded in Official Record Book 9175, page 3641 and re-recorded in Official Record Book 9193, page 2439 of the records of the Hamilton County, Ohio Recorder; non-delinquent real property taxes, non-delinquent installments of assessments, existing easements, conditions and restrictions of record.

More commonly known as: 9812 Beech Drive, Cincinnati, Ohio 45231  
Record Owner: Derrick Bryant Revocable Living Trust  
Parcel Id: 590-0171-0066-00;

- c) Real Property known and numbered as 1515 Gelhot Drive, Fairfield, Butler County, Ohio 45014, with all appurtenances, attachments and improvements attached thereto, legally described as:

Situated in the City of Fairfield, County of Butler, and the State of Ohio.

Being Unit Number 164 of Rolling Meadows Condominiums, Phase XV and being Registered Land Certificate #3102 in the Recorder's Office of Butler County, Ohio.

Be the same more or less, but subject to all legal highways.

SAVE AND EXCEPT easements and restrictions of record, zoning ordinances, real estate taxes and assessments, if any, prorated to the date of this deed.

Street address of property: 1515 Gelhot Drive, Unit 164, Fairfield, Ohio 45014

Record Owner: Derrick Bryant

Butler County Parcel Number: A0700-217-000-215;

- d) Real Property known and numbered as 4336 Green Pastures Way, Ellenwood, Dekalb County, Georgia 30294, with all appurtenances, attachments and improvements attached thereto, legally described as:

All that tract or parcel of land lying and being in Land Lot 1, 15th District, DeKalb County, State of Georgia, being Lot 5 of the River Vista Estates Subdivision, Phase 3, as per plat recorded in Plat Book 187, pages 2-13, DeKalb County Records, said plat being incorporated herein and made a part hereof by reference.

Street address of property: 4336 Green Pastures Way, Ellenwood, Georgia 30294

Record Owner: Golden Homes Investments, LLC

Dekalb County Parcel Number: 15-001-01-044;

- e) \$79,980.00 in U.S. Currency seized from Min Wang on 9/20/19;
- f) \$14,168.00 in U.S. Currency seized from Lashone Isom on 10/24/19;
- g) \$5,367.00 in U.S. Currency seized from Derrick L. Bryant on 10/24/19;
- h) \$2,780.00 in U.S. Currency seized from William Graham III on 10/24/19;
- i) \$41,000.00 in U.S. Currency seized from Latoya Robinson on 10/24/19;
- j) \$104,520.00 in U.S. Currency seized from Arlisha Howard on 10/25/19;
- k) \$13,600.00 in U.S. Currency seized from Jose Luis Toquillas-Felix on 10/24/19;
- l) \$50,208.00 in U.S. Currency seized from Maurice Jackson on 10/24/19;
- m) Contents of PNC Bank Account Number xxx5259 in the name of TSJ Jewelers, Inc. DBA Tri-State Jewelers, Inc.;
- n) Contents of PNC Bank Account Number xxxx0821 in the name of Nationwide Automotive Group;
- o) 2017 Black GMC Sierra Truck, model Denali HD, VIN WDDUG8FB0FA108843, seized from Derrick BRYANT, with all attachments thereon;
- p) 2015 Black Mercedes Sedan, model S550 "4matic", VIN WDDUG8FB0FA108843, seized from Derrick BRYANT; with all attachments thereon;



- q) 2007 Gold Toyota Camry, VIN 4T1BK46K07U503142, seized from Carlos FLORES-INZUNZA, with all attachments thereon;
- r) 2016 Red Mercedes G Wagon, VIN WDCYC7DF4GX254114, with all attachments thereon;
- s) Assorted Miscellaneous Jewelry seized from 9812 Beech Drive, Cincinnati, Ohio 45231;
- t) A Glock 22, .40 caliber handgun, bearing serial number BTX116, with any attachments and ammunition, including thirteen (13) .40 S&W Winchester rounds;
- u) A SCCY, CPX-1, 9mm semi-automatic handgun, bearing serial number 655747, with any attachments and ammunition, including nine (9) 9mm Luger rounds and fifteen (15) CBC .25 auto rounds of ammunition;
- v) A Ruger, SR9C, 9x19mm, bearing serial number 332-09771, with any attachments and ammunition, including fifteen (15) Hornady 9mm Luger rounds and 1 box of PMC, 380 caliber rounds of ammunition;
- w) A German Sports Gun (GSG) .22 long rifle, bearing serial number A302605, with any attachments and ammunition;
- x) A Llama .45 caliber handgun, bearing serial number C19995, with any attachments and ammunition; and
- y) Two (2) boxes of ammunition with two extra loaded magazines and loose ammunition seized from 9812 Beech Drive.

#### **FORFEITURE ALLEGATION TWO**

Upon conviction of one or more of the offenses set forth in Counts 1, 2, 6, 7, and/or 8 of this Indictment, the defendants, **LASHONE ISOM and DANIEL SIMMONS**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in such violation(s), including but not limited to, the firearms and ammunition listed in Forfeiture Allegation One.

#### **FORFEITURE ALLEGATION THREE**

Upon conviction of one or more of the offenses set forth in Counts 11 through 13 of this Indictment, the defendants, **VYACHESLAV MINYAYLO a.k.a. "SLAVIK"; DEWAYNE WALKER; YOSI ILOUZ; JOSE DANIEL ZAZUETA-HERNANDEZ, A.K.A. JESUS**



**BOJORQUEZ, A.K.A. "DANY"; XINGHUI LIN; AYMAN ANIS AL HAJJEH; CARLOS FLORES-INZUNZA; and MIN WANG**, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense(s), and any property traceable to such property, including but not limited to:

- a) A sum of money equal to the amount of money involved in the offenses;
- b) \$79,980.00 in U.S. Currency seized from Min Wang on 9/20/19;
- c) Contents of PNC Bank Account Number xxx5259 in the name of TSJ Jewelers, Inc. DBA Tri-State Jewelers, Inc.; and
- d) Contents of PNC Bank Account Number xxxx0821 in the name of Nationwide Automotive Group.

#### **SUBSTITUTE ASSETS**

If any of the property described in the Forfeiture Allegations above, as a result of any act or omission of the defendants:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), or as incorporated by 18 U.S.C. § 982(b)(1) or 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendants, up to the value of the property described above, including but not limited to:

- a) Real Property known and numbered as 2782 Queen City Avenue, Cincinnati, Hamilton County, Ohio 45238, with all appurtenances, attachments and improvements attached thereto, legally described as:

Situated in the County of Hamilton, in the State of Ohio and in the Township of Green;

Beginning in the Northeasterly line of Queen City Avenue at a point which is South 62°30" East, 265.00 feet from the intersection of said Northeasterly line with the East line of Dunaway Avenue; thence continuing South 62° 30" East along the Northeasterly line of Queen City Avenue, 56.66 feet to a point; thence North 27° 59' 30" East at right angles to Queen City Avenue, 185.49 feet to a point; thence North 58° 38' 40" West, 56.76 feet to a point; thence South 27°59'30" West 188.82 feet to the point of beginning.

More commonly known as: 2782 Queen City Avenue, Cincinnati, Ohio 45238  
Record Owner: Golden Homes Investments LLC  
Parcel Id: 208-0067-0047-00; and

- b) Real Property known and numbered as 9457 Ridgemoor Avenue, Cincinnati, Hamilton County, Ohio 45231, with all appurtenances, attachments and improvements attached thereto, legally described as:

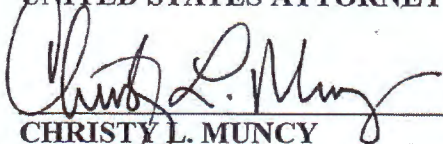
SITUATE IN SECTION 3, TOWN 2, ENTIRE RANGE 1, MIAMI PURCHASE, COLERAIN TOWNSHIP, HAMILTON COUNTY, OHIO, AND BEING ALL OF LOT NO. 296 OF COMPTON ESTATES SUBDIVISION, BLOCK "B", PART 4, A PLAT OF WHICH IS RECORDED IN PLAT BOOK 93, PAGES 75 AND 76 OF THE HAMILTON COUNTY, OHIO RECORDS

More commonly known as: 9457 Ridgemoor Avenue, Cincinnati, Ohio 45231  
Record Owner: Derrick Bryant Revocable Living Trust  
Parcel Id: 510-0051-0479-00.

A True Bill.

  
Grand Jury Foreperson

DAVID M. DEVILLERS  
UNITED STATES ATTORNEY

  
CHRISTY L. MUNCY  
Assistant United States Attorney  
Organized Crime Drug Enforcement Task Force